

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

CASE NO. 21-03574 ESL

JAIME R NIETO DELTORO

Debtor

CHAPTER 13

MOTION REQUESTING WITHDRAWAL AS LEGAL COUNSELOR

TO THE HONORABLE COURT:

NOW COMES the undersigned attorney and very respectfully ALLEGE AND PRAY:

1. Our law offices represented the creditor Jaime R. Nieto del Toro in the instant case since December 21st, 2021, up to the present.
2. On July 19th, 2022 the undersigned by phone contact with debtor discussed pending matters in the instant case. The undersigned realized that there are professional discrepancies between legal counsel and the debtor, therefore the undersigned would request the resignation as legal counsel.
3. Due to the above informed the undersigned attorney hereby respectfully requests from this Honorable Court to withdraw from legal representation of the debtor and to grant his at least thirty (30) days to obtain a new legal representation.

WHEREFORE, it is respectfully prayed from this Honorable Court to allow the undersigned counsel to withdraw from the legal representation and any pending matter be held in abeyance until the Debtor retains new legal representation, and that all further remedies are as proper and just be granted.

I HEREBY CERTIFY on this same date I electronically filed the foregoing document with the clerk of the court using the CM/ECF System which will send notification

of such filing to the following: Chapter 13 Trustee, US Trustee and to all creditors registered to said system. On this same date, I have sent copy of said document by regular mail to all parties in interest that are non CM/ECF participants as of the creditor matrix attached hereto.

In San Juan, Puerto Rico this 20th day of July 2022.

By: /s/ Juan C. Bigas Valedon
JUAN C. BIGAS VALEDON
Attorney for Creditor
U.S.D.C. NO. 215404
P.O. Box 7011
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Label Matrix for local noticing
0104-3
Case 21-03574-ESL7
District of Puerto Rico
Old San Juan
Fri Jan 28 10:45:15 AST 2022

BMW FINANCIAL SERVICES NA LLC DEPARTMENT
AIS PORTFOLIO SERVICES LP
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY, OK 73118-7901

ISLAND PORTFOLIO SERVICES LLC AS SERVICER OF
P O BOX 361110
SAN JUAN
SAN JUAN, PR 00936-1110

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

ASUME
PO BOX 71316
SAN JUAN, PR 00936-8416

BANCO POPULAR DE PUERTO RIC
PO BOX 362708
SAN JUAN, PR 00936-2708

(p)BMW FINANCIAL SERVICES
CUSTOMER SERVICE CENTER
PO BOX 3608
DUBLIN OH 43016-0306

ISLAND PORTFOLIO SERVICES LLC
PO BOX 361110
SAN JUAN, PR 00936-1110

RS CONSULTING SERVICES, INC
PO BOX 968
CAGUAS, PR 00726-0968

JAIME R NIETO DEL TORO
1511 AVE PONCE DE LEON
CIUDADELA PLAZA DEL MUSEO 1400 APT 14101
SAN JUAN, PR 00909

JUAN CARLOS BIGAS VALEDON
JUAN C BIGAS LAW OFFICE
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PONCE, PR 00732-7011

MONSITA LECAROS ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

NOREEN WISCOVITCH RENTAS
PMB 136
400 CALAF STREET
SAN JUAN, PR 00918-1313

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

BMW FINANCIAL SERVICES
PO BOX 9001065
LOUISVILLE, KY 40290

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)RS CONSULTING SERVICES, INC.

(d)BMW FINANCIAL SERVICES NA LLC DEPARTMENT
AIS PORTFOLIO SERVICES LP
4515 N SANTA FE AVE DEPT APS
OKLAHOMA CITY OK 73118-7901

End of Label Matrix
Mailable recipients 12
Bypassed recipients 2
Total 14